UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-11417-RCL

CHRISTOPHER C. BITTNER and CAROL BITTNER,

Plaintiffs

v.

FRANK WILLIAMS, THEODORE A. SAULNIER, In His Capacity as CHIEF OF THE TISBURY POLICE DEPARTMENT, and THE TOWN OF TISBURY,

Defendants

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Now come the parties to the above-captioned action and hereby respectfully move for the Court's entry and execution of the enclosed Protective Order, to whose terms the parties have stipulated via the execution of same by their respective counsel.

As grounds therefor, the parties state that the proposed Order shall facilitate exchange of materials during discovery while maintaining the parties' legitimate privacy interests.

PLAINTIFFS,

CHRISTOPHER C. BITTNER and CAROL BITTNER,

By their attorney,

Andrew M. Fischer (BBO# 167040)

Jason & Fischer 47 Winter Street Boston, MA 02108 (617) 423-7904 DEFENDANTS,

TOWN OF TISBURY, FRANK WILLIAMS and CHIEF THEODORE A. SAULNIER,

By their attorneys,

Joseph L. Tehan, Jr. (BBO# 494020) Katharine Goree Doyle (BBO# 63413

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FRANK WILLIAMS,

By their attorneys,

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